REMARKS/ARGUMENTS

The Applicants respectfully request the Examiner to enter the presented amendments prior to the examination of the application. The foregoing amendment and the following arguments are provided to impart precision to the claims, by more particularly pointing out the invention, rather than to avoid prior art.

35 U.S.C. § 102(b) Rejections

In the prior final office action dated July 2, 2003 responsive to patent application number 09/885,623, the Examiner rejected claims 1-4, 6-11, 13-18, 20-23, 25, 27-32, and 34-35 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent 5,530,457 (hereinafter "Helgeson").

To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974).

Independent claims 1, 8, 15, 22, and 29 of the present application include limitations that are not disclosed or suggested by Helgeson. In particular, the claims include the limitation, or limitation similar thereto, of receiving image information in digital format from at least one image processing device, wherein image information includes mapping information, wherein said mapping information specifies at least one target location in a display space of a plurality of display modules.

Helgeson does not teach such limitations. Rather, Helgeson describes a memory architecture and display apparatus which provides the ability to transmit video data to a display at high display rates. (Helgeson, col. 3, lines 22-25). Specifically, Helgeson teaches that **pixel data** is received by a reconfigurable memory architecture 12 from a digital video 16. (Helgeson, col. 3, line 35-40). Thus, Helgeson fails to disclose or suggest receiving image information in digital format from at least one image processing device, wherein image information includes mapping information, wherein said mapping information specifies at least one target location in a display space of a plurality of display modules.

Moreover, modifying Helgeson to include receiving image information in digital format from at least one image processing device, wherein image information includes mapping information, as is claimed by Applicant, would render the prior art unsatisfactory for its intended purpose. As previously mentioned, Helgeson describes a memory architecture and display apparatus which provides the ability to transmit video data to a display at high display rates. (Helgeson, col. 3, lines 22-25). Helgeson further describes that accumulator 22 of reconfigurable memory architecture 12 receives pixel data 18 from the video source 16 in a sequential fashion. (Helgeson, col. 3, lines 49-51). Accordingly, since pixel data is received in a sequential manner, there is no need to receive mapping information, which specifies at least one target location in a display space, from at least one image processing device, as is claimed by Applicant. Receiving mapping information in addition to pixel data would

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render the prior art less efficient for its intended purpose, namely, to transmit video data to a display at high display rates. Thus, Helgeson does not disclose or suggest receiving image information in digital format from at least one image processing device, wherein image information includes mapping information, wherein said mapping information specifies at least one target location in a display space of a plurality of display modules.

Accordingly, Helgeson does not anticipate independent claims 1, 8, 15, 22, and 29. Claims 2-4, 6, 7, 9-11, 13, 14, 16-18, 20, 21, 23, 25, 27, 28, 30-32, 34, and 35 depend from one of the foregoing independent claims and thus include the novel claim limitations discussed above. Therefore, claims 2-4, 6, 7, 9-11, 13, 14, 16-18, 20, 21, 23, 25, 27, 28, 30-32, 34, and 35 are not anticipated by Helgeson.

CONCLUSION

Applicants respectfully submit the present application is in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call John Ward at (408) 720-8300, x237.

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due.

Respectfully submitted,

BLAKELY, SOKQLOFF, TAYLOR & ZAFMAN

Date: 3//8/09

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